

**EXPERT REPORT OF MAXWELL PALMER, PH.D.
IN SUPPORT OF PLAINTIFFS' BRIEF IN OPPOSITION
TO REMEDIAL PROPOSALS**

1. My name is Maxwell Palmer. I am currently an Associate Professor of Political Science at Boston University. I previously submitted reports in the *Caster* case on December 12, 2021, and July 28, 2023. My first report in that case sets forth my qualifications in detail.
2. I testified in *Caster* in the January 2022 preliminary injunction proceedings. I was accepted by the Court as an expert in redistricting and data analysis. The Court found me to be a credible expert witness and credited my testimony on racially polarized voting and performance in its January 2022 and September 2023 opinions.
3. I also submitted a report evaluating the performance of the VRA Plaintiffs' Remedial Plan on September 11, 2023.
4. I was asked by the Caster Plaintiffs in this litigation to evaluate the performance of the Pringle Plan, the Singleton Plan, the Hillyer Plan, the ADC Plan, McCrary Plan A, McCrary Plan B, the 2021 Minimum Change Plan, and the 2023 Minimum Change Plan.
5. For each plan, I analyzed the performance of districts by relying on precinct-level election results from the 2016, 2018, and 2020 general elections, and the 2017 special election for U.S. Senate. My original *Caster* report describes this dataset.
6. I supplemented this dataset with 2022 general election results from the data file disclosed by Dr. Baodong Liu with his July 28, 2023 report.
7. I then analyzed performance by calculating the share of the vote that the Black-preferred candidate would have won under the boundaries of each plan.

Performance of the 2nd and 7th Districts in the Pringle Plan

8. I analyzed the performance of the 2nd and 7th Districts in the Pringle Plan. Figure 1 and Table 1 present the results.
9. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 2nd District is 47.3%. The Black-preferred candidate won only 4 of the 17 elections analyzed.
10. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 62.7%. The Black-preferred candidate won all 17 of the elections analyzed.

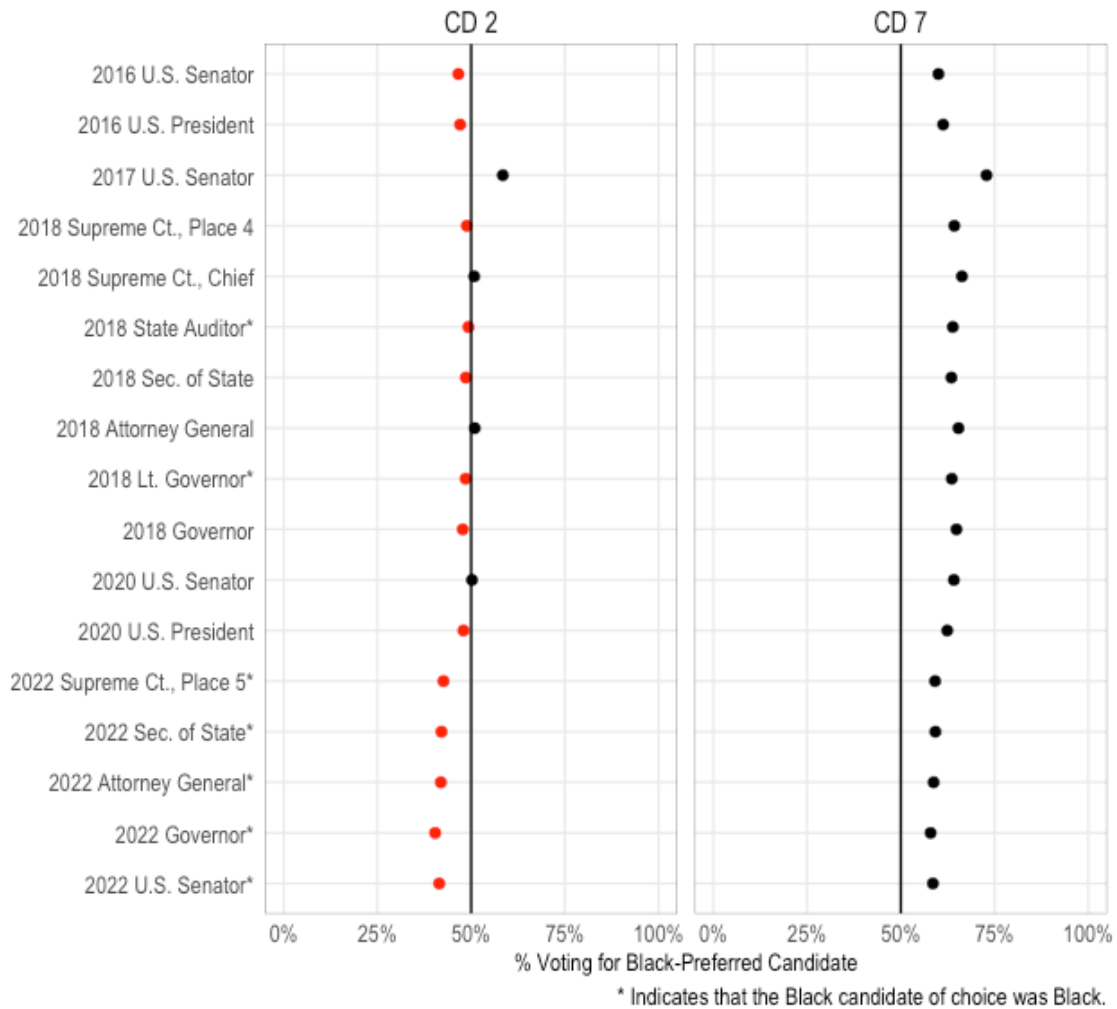


Figure 1: Vote Shares of Black-Preferred Candidates Under the Pringle Plan

Table 1: Vote Shares of Black-Preferred Candidates Under the Pringle Plan

Year	Office	CD 2	CD 7
2016	U.S. President	47.1%	61.3%
2016	U.S. Senator	46.6%	60.0%
2017	U.S. Senator	58.4%	72.8%
2018	Attorney General	51.0%	65.4%
2018	Governor	47.8%	64.8%
2018	Lt. Governor*	48.5%	63.6%
2018	Sec. of State	48.6%	63.5%
2018	State Auditor*	49.3%	63.8%
2018	Supreme Ct., Chief	50.8%	66.3%
2018	Supreme Ct., Place 4	48.9%	64.3%
2020	U.S. President	48.0%	62.4%
2020	U.S. Senator	50.2%	64.1%
2022	Attorney General*	41.9%	58.7%
2022	Governor*	40.4%	57.9%
2022	Sec. of State*	42.1%	59.2%
2022	Supreme Ct., Place 5*	42.6%	59.1%
2022	U.S. Senator*	41.5%	58.6%

* indicates that the Black candidate of choice was Black

Performance of the 6th and 7th Districts in the Singleton Plan

11. I analyzed the performance of the 6th and 7th Districts in the Singleton Plan. Figure 2 and Table 2 present the results.
12. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 6th District is 54.6%. The Black-preferred candidate won 16 of the 17 elections analyzed.
13. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 56.9%. The Black-preferred candidate won all 17 of the elections analyzed.

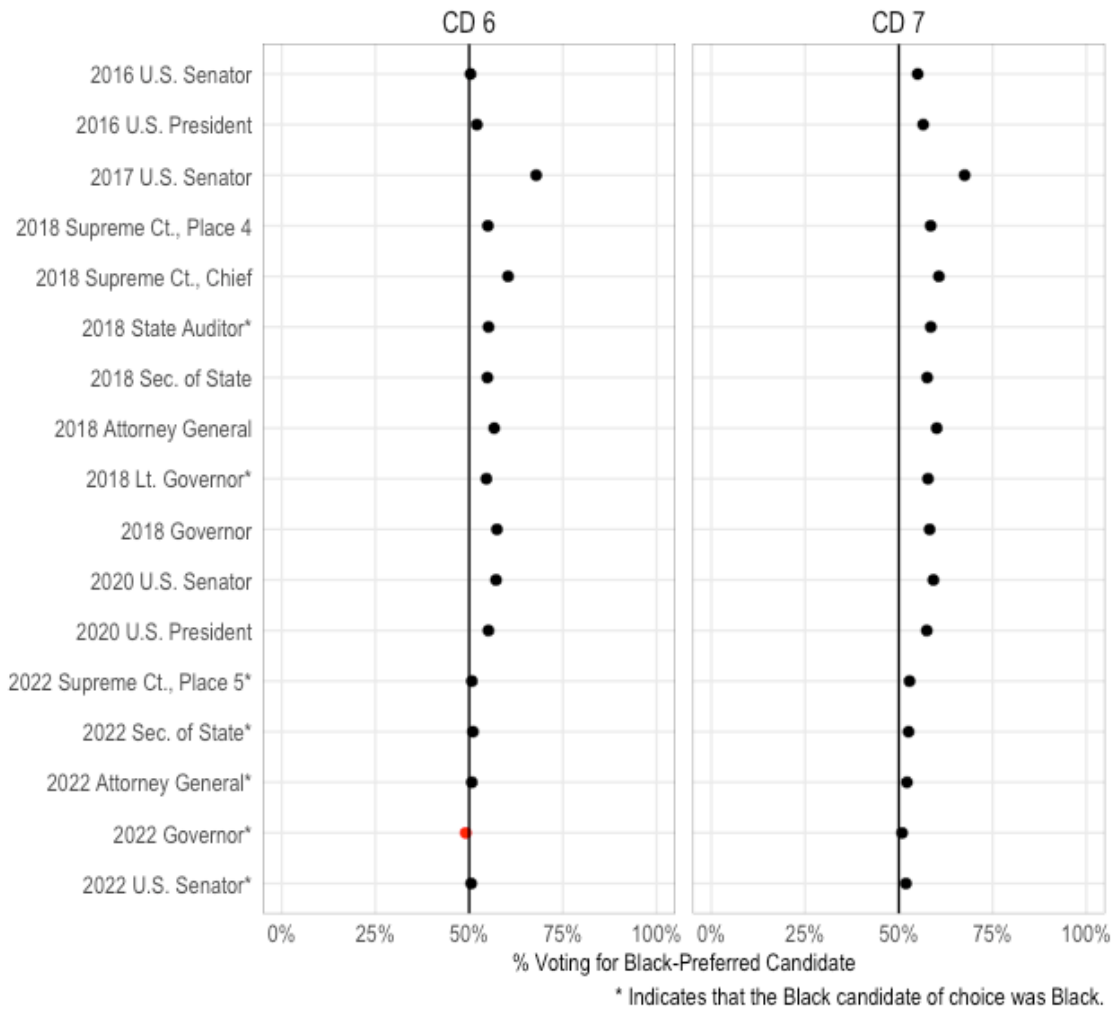


Figure 2: Vote Shares of Black-Preferred Candidates Under the Singleton Plan

Table 2: Vote Shares of Black-Preferred Candidates Under the Singleton Plan

Year	Office	CD 6	CD 7
2016	U.S. President	52.1%	56.5%
2016	U.S. Senator	50.4%	55.0%
2017	U.S. Senator	67.9%	67.5%
2018	Attorney General	56.7%	60.1%
2018	Governor	57.4%	58.2%
2018	Lt. Governor*	54.6%	57.8%
2018	Sec. of State	54.9%	57.6%
2018	State Auditor*	55.2%	58.5%
2018	Supreme Ct., Chief	60.4%	60.7%
2018	Supreme Ct., Place 4	55.0%	58.5%
2020	U.S. President	55.1%	57.4%
2020	U.S. Senator	57.2%	59.2%
2022	Attorney General*	50.7%	52.2%
2022	Governor*	49.1%	50.9%
2022	Sec. of State*	51.0%	52.6%
2022	Supreme Ct., Place 5*	50.7%	52.8%
2022	U.S. Senator*	50.5%	51.9%

* indicates that the Black candidate of choice was Black

Performance of the 1st and 7th Districts in the Hillyer Plan

14. I analyzed the performance of the 1st and 7th Districts in the Hillyer Plan. Figure 3 and Table 3 present the results.
15. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 1st District is 52.9%. The Black-preferred candidate won 12 of the 17 elections analyzed.
16. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 63.8%. The Black-preferred candidate won all 17 of the elections analyzed.

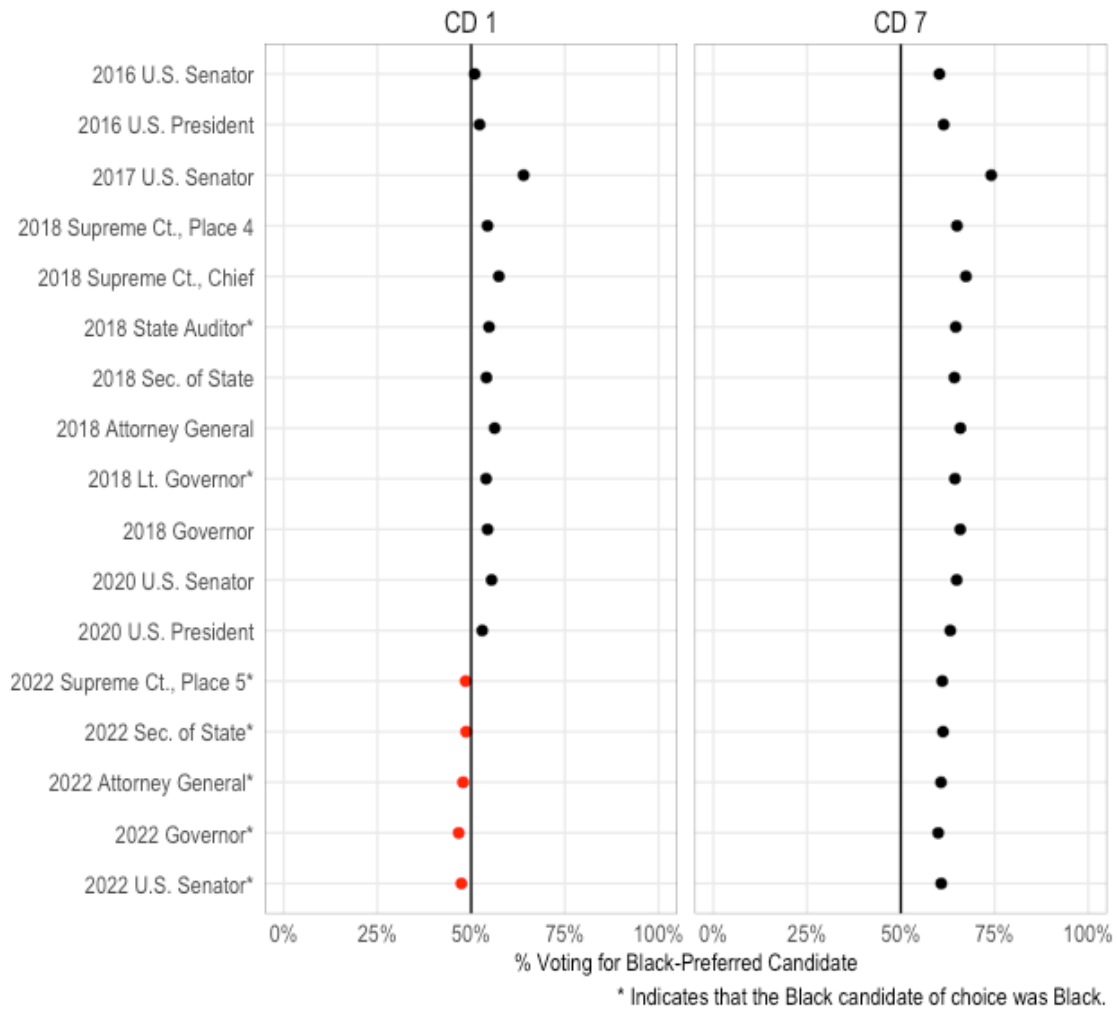


Figure 3: Vote Shares of Black-Preferred Candidates Under the Hillyer Plan

Table 3: Vote Shares of Black-Preferred Candidates Under the Hillyer Plan

Year	Office	CD 1	CD 7
2016	U.S. President	52.2%	61.4%
2016	U.S. Senator	50.9%	60.3%
2017	U.S. Senator	64.0%	74.1%
2018	Attorney General	56.3%	65.9%
2018	Governor	54.4%	65.8%
2018	Lt. Governor*	54.0%	64.4%
2018	Sec. of State	54.1%	64.3%
2018	State Auditor*	54.8%	64.6%
2018	Supreme Ct., Chief	57.4%	67.4%
2018	Supreme Ct., Place 4	54.4%	65.0%
2020	U.S. President	52.9%	63.2%
2020	U.S. Senator	55.4%	64.9%
2022	Attorney General*	47.8%	60.7%
2022	Governor*	46.7%	60.0%
2022	Sec. of State*	48.7%	61.2%
2022	Supreme Ct., Place 5*	48.5%	61.1%
2022	U.S. Senator*	47.4%	60.8%

* indicates that the Black candidate of choice was Black

Performance of the 2nd and 7th Districts in the ADC Plan

17. I analyzed the performance of the 2nd and 7th Districts in the ADC Plan. Figure 4 and Table 4 present the results.
18. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 2nd District is 58.4%. The Black-preferred candidate won all 17 of the elections analyzed.
19. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 67.7%. The Black-preferred candidate won all 17 of the elections analyzed.

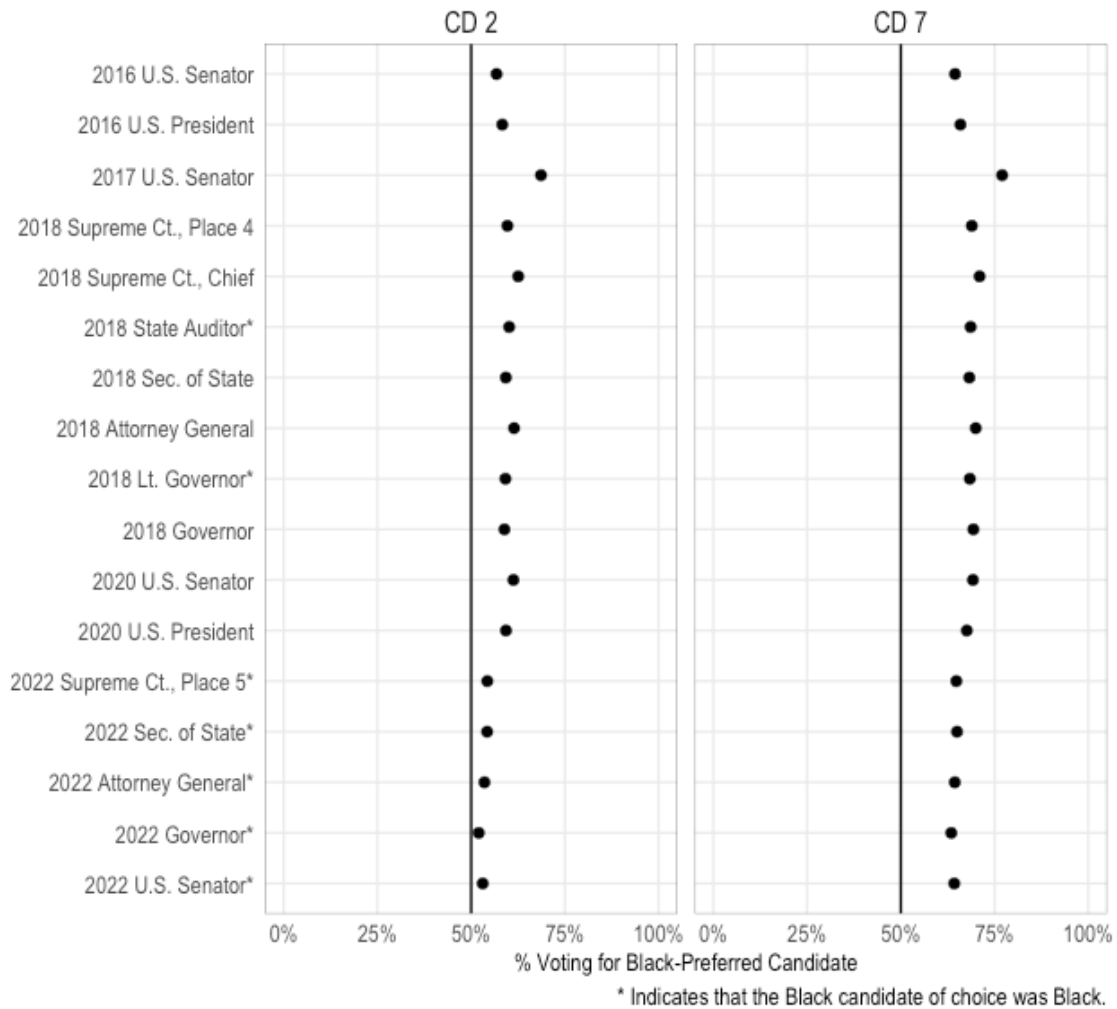


Figure 4: Vote Shares of Black-Preferred Candidates Under the ADC Plan

Table 4: Vote Shares of Black-Preferred Candidates Under the ADC Plan

Year	Office	CD 2	CD 7
2016	U.S. President	58.3%	65.9%
2016	U.S. Senator	56.8%	64.5%
2017	U.S. Senator	68.6%	77.0%
2018	Attorney General	61.4%	70.0%
2018	Governor	58.9%	69.3%
2018	Lt. Governor*	59.1%	68.4%
2018	Sec. of State	59.2%	68.3%
2018	State Auditor*	60.1%	68.6%
2018	Supreme Ct., Chief	62.5%	71.0%
2018	Supreme Ct., Place 4	59.7%	68.9%
2020	U.S. President	59.3%	67.6%
2020	U.S. Senator	61.3%	69.2%
2022	Attorney General*	53.5%	64.4%
2022	Governor*	52.0%	63.5%
2022	Sec. of State*	54.3%	65.0%
2022	Supreme Ct., Place 5*	54.3%	64.8%
2022	U.S. Senator*	53.1%	64.2%

* indicates that the Black candidate of choice was Black

Performance of the 2nd and 7th Districts in the McCrary Plan A

20. I analyzed the performance of the 2nd and 7th Districts in the McCrary Plan A. Figure 5 and Table 5 present the results.
21. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 2nd District is 55.3%. The Black-preferred candidate won 15 of the 17 elections analyzed.
22. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 61.3%. The Black-preferred candidate won all 17 of the elections analyzed.

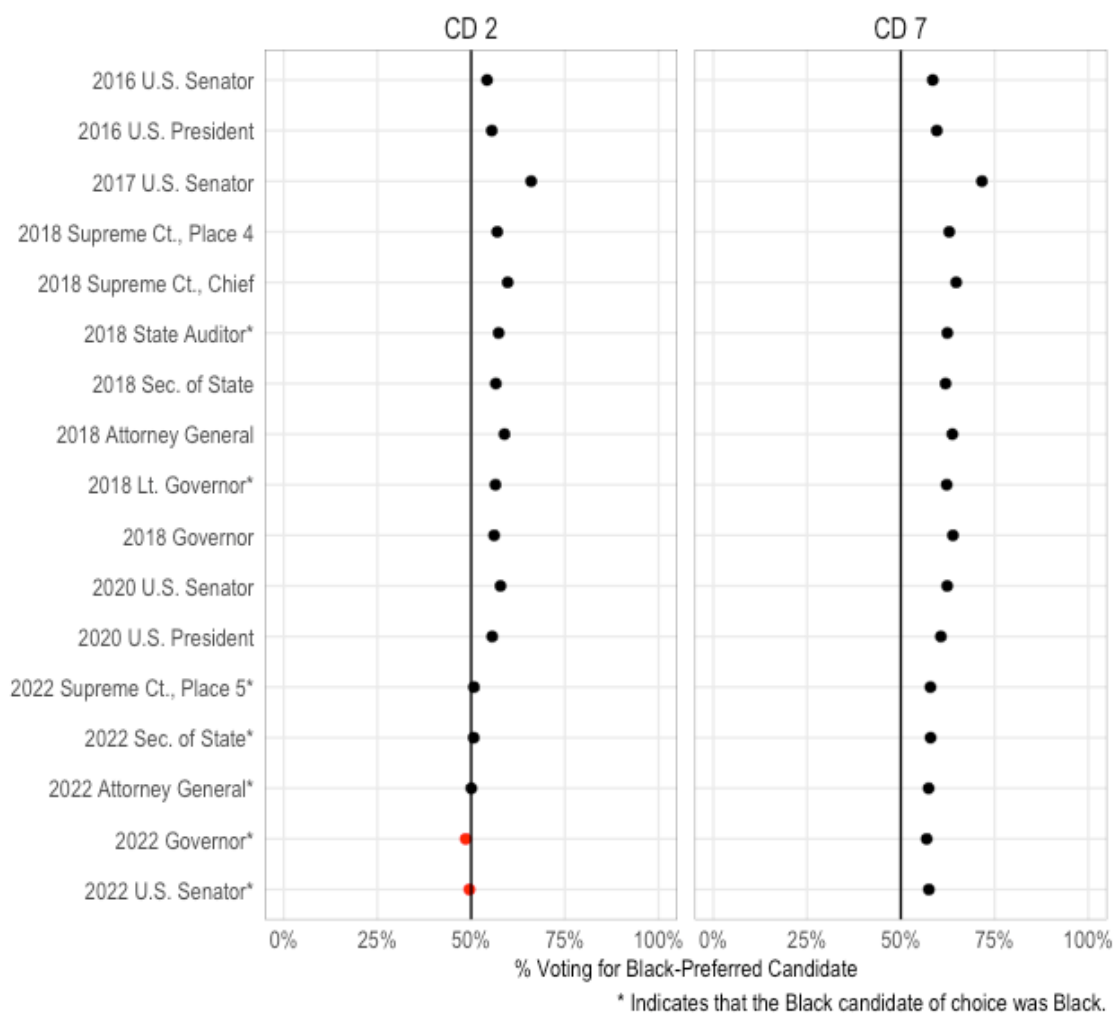


Figure 5: Vote Shares of Black-Preferred Candidates Under the McCrary Plan A

Table 5: Vote Shares of Black-Preferred Candidates Under the McCrary Plan A

Year	Office	CD 2	CD 7
2016	U.S. President	55.5%	59.6%
2016	U.S. Senator	54.2%	58.5%
2017	U.S. Senator	66.0%	71.6%
2018	Attorney General	58.9%	63.7%
2018	Governor	56.1%	63.9%
2018	Lt. Governor*	56.5%	62.2%
2018	Sec. of State	56.6%	61.9%
2018	State Auditor*	57.3%	62.4%
2018	Supreme Ct., Chief	59.7%	64.8%
2018	Supreme Ct., Place 4	57.0%	62.9%
2020	U.S. President	55.6%	60.7%
2020	U.S. Senator	57.8%	62.4%
2022	Attorney General*	50.0%	57.4%
2022	Governor*	48.6%	56.9%
2022	Sec. of State*	50.7%	57.9%
2022	Supreme Ct., Place 5*	50.8%	57.9%
2022	U.S. Senator*	49.5%	57.5%

* indicates that the Black candidate of choice was Black

Performance of the 2nd and 7th Districts in the McCrary Plan B

23. I analyzed the performance of the 2nd and 7th Districts in the McCrary Plan B. Figure 6 and Table 6 present the results.
24. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 2nd District is 58.0%. The Black-preferred candidate won all 17 of the elections analyzed.
25. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 60.7%. The Black-preferred candidate won all 17 of the elections analyzed.

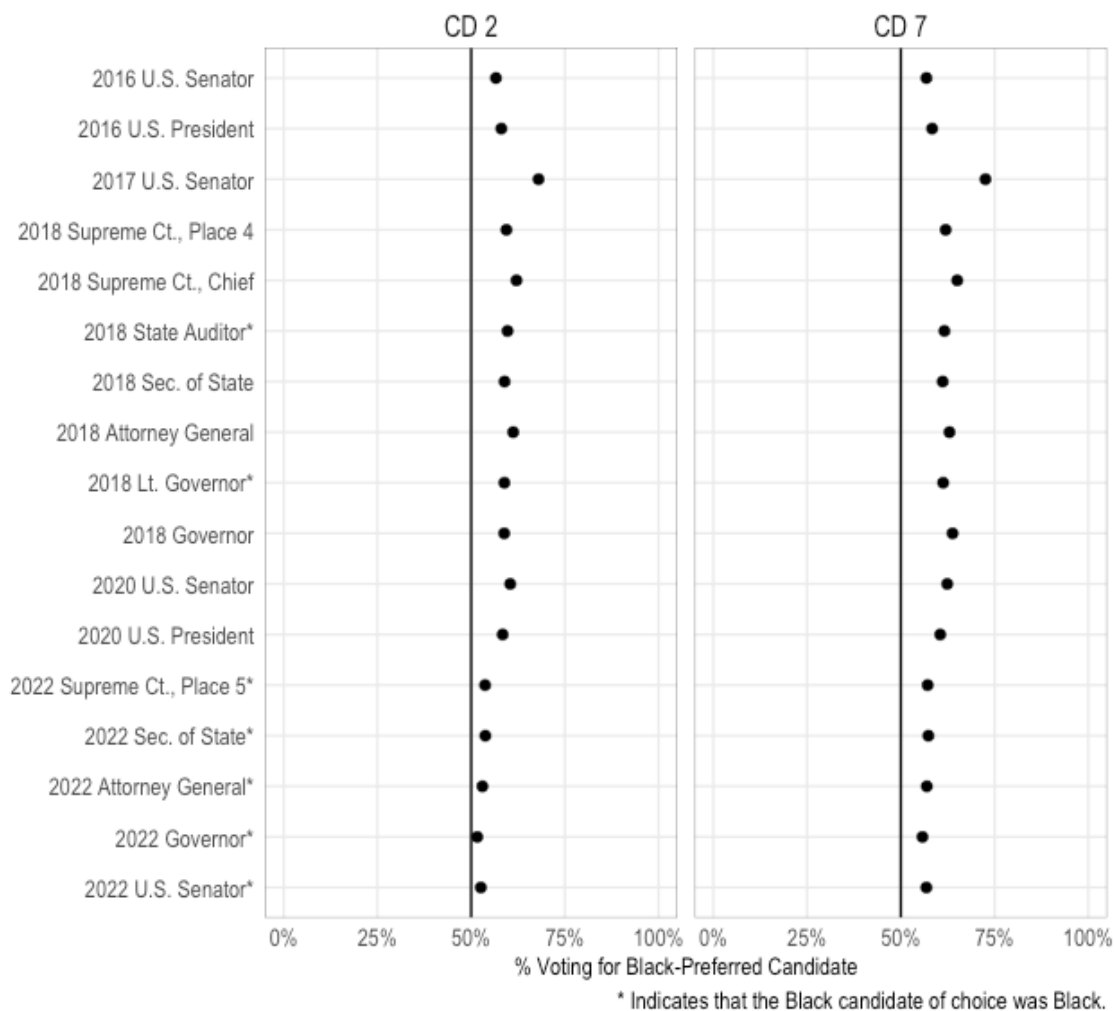


Figure 6: Vote Shares of Black-Preferred Candidates Under the McCrary Plan B

Table 6: Vote Shares of Black-Preferred Candidates Under the McCrary Plan B

Year	Office	CD 2	CD 7
2016	U.S. President	58.1%	58.3%
2016	U.S. Senator	56.6%	56.8%
2017	U.S. Senator	68.0%	72.6%
2018	Attorney General	61.2%	63.0%
2018	Governor	58.8%	63.8%
2018	Lt. Governor*	58.9%	61.3%
2018	Sec. of State	58.9%	61.2%
2018	State Auditor*	59.7%	61.6%
2018	Supreme Ct., Chief	62.1%	65.0%
2018	Supreme Ct., Place 4	59.4%	61.9%
2020	U.S. President	58.4%	60.5%
2020	U.S. Senator	60.4%	62.4%
2022	Attorney General*	53.0%	56.9%
2022	Governor*	51.6%	55.8%
2022	Sec. of State*	53.8%	57.3%
2022	Supreme Ct., Place 5*	53.7%	57.1%
2022	U.S. Senator*	52.6%	56.8%

* indicates that the Black candidate of choice was Black

Performance of the 2nd and 7th Districts in the 2021 Minimum Change Plan

26. I analyzed the performance of the 2nd and 7th Districts in the 2021 Minimum Change Plan. Figure 7 and Table 7 present the results.
27. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 2nd District is 54.1%. The Black-preferred candidate won 12 of the 17 elections analyzed.
28. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 59.0%. The Black-preferred candidate won all 17 of the elections analyzed.

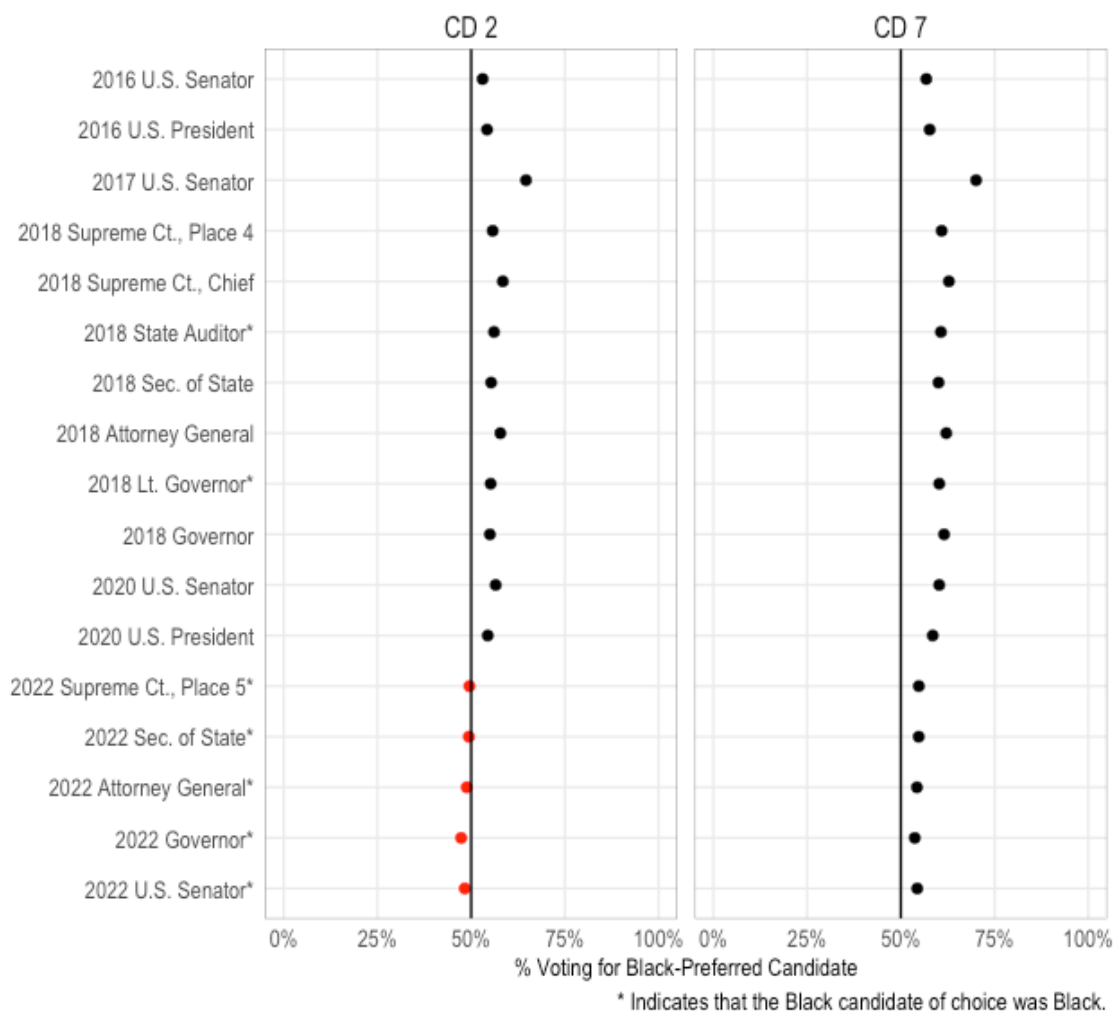


Figure 7: Vote Shares of Black-Preferred Candidates Under the 2021 Minimum Change Plan

Table 7: Vote Shares of Black-Preferred Candidates Under the 2021 Minimum Change Plan

Year	Office	CD 2	CD 7
2016	U.S. President	54.2%	57.7%
2016	U.S. Senator	53.1%	56.8%
2017	U.S. Senator	64.6%	70.1%
2018	Attorney General	57.8%	62.1%
2018	Governor	55.0%	61.5%
2018	Lt. Governor*	55.2%	60.3%
2018	Sec. of State	55.3%	60.0%
2018	State Auditor*	56.1%	60.7%
2018	Supreme Ct., Chief	58.5%	62.8%
2018	Supreme Ct., Place 4	55.7%	60.9%
2020	U.S. President	54.4%	58.5%
2020	U.S. Senator	56.6%	60.2%
2022	Attorney General*	48.8%	54.3%
2022	Governor*	47.3%	53.7%
2022	Sec. of State*	49.4%	54.8%
2022	Supreme Ct., Place 5*	49.5%	54.8%
2022	U.S. Senator*	48.3%	54.4%

* indicates that the Black candidate of choice was Black

Performance of the 2nd and 7th Districts in the 2023 Minimum Change Plan

29. I analyzed the performance of the 2nd and 7th Districts in the 2023 Minimum Change Plan. Figure 8 and Table 8 present the results.
30. Across 17 elections from 2016 to 2022, the average vote share for Black-preferred candidates in the 2nd District is 55.1%. The Black-preferred candidate won 14 of the 17 elections analyzed.
31. Across 17 elections from 2016 to 2020, the average vote share for Black-preferred candidates in the 7th District is 64.8%. The Black-preferred candidate won all 17 of the elections analyzed.

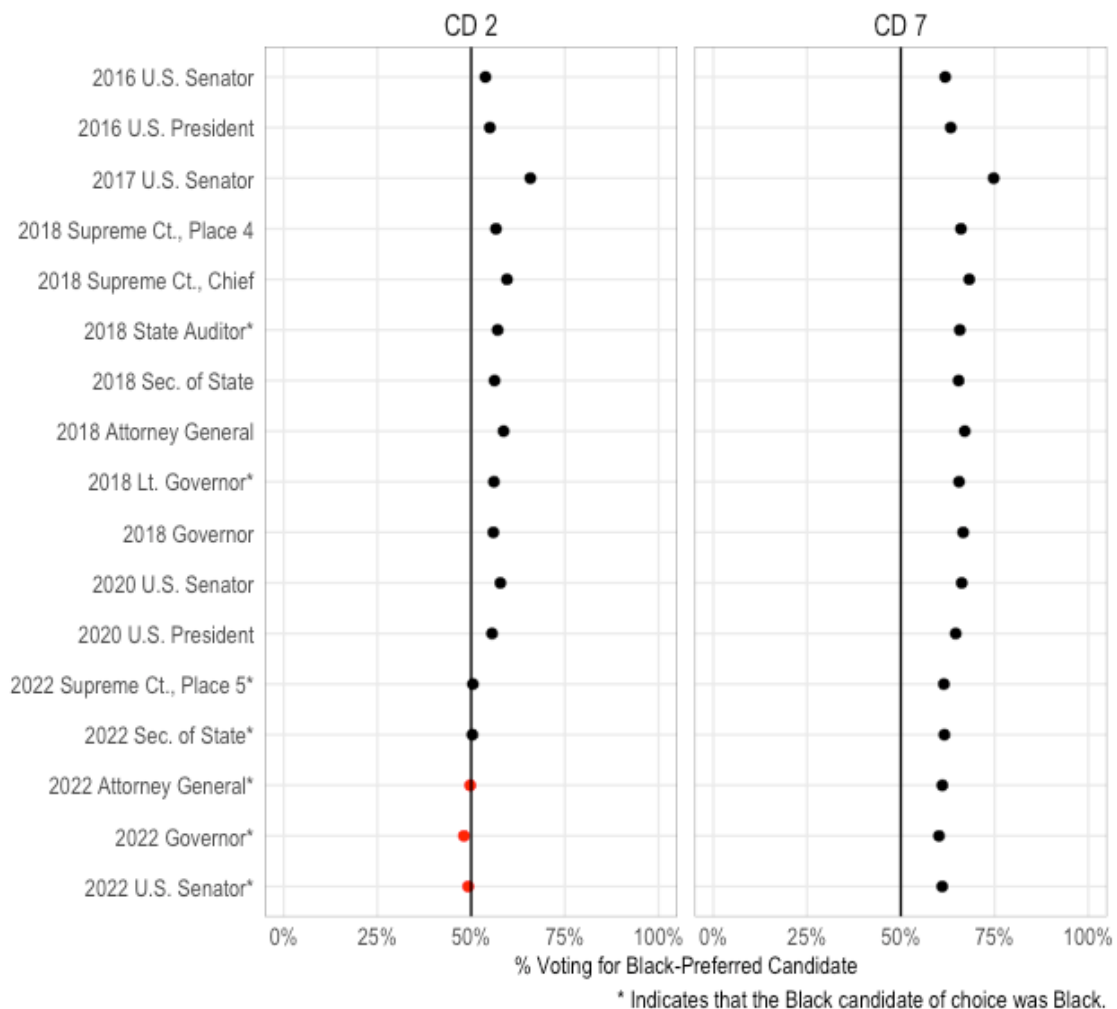


Figure 8: Vote Shares of Black-Preferred Candidates Under the 2023 Minimum Change Plan

Table 8: Vote Shares of Black-Preferred Candidates Under the 2023 Minimum Change Plan

Year	Office	CD 2	CD 7
2016	U.S. President	55.0%	63.3%
2016	U.S. Senator	53.8%	61.8%
2017	U.S. Senator	65.8%	74.8%
2018	Attorney General	58.6%	67.0%
2018	Governor	55.9%	66.6%
2018	Lt. Governor*	56.1%	65.5%
2018	Sec. of State	56.2%	65.4%
2018	State Auditor*	57.1%	65.7%
2018	Supreme Ct., Chief	59.6%	68.3%
2018	Supreme Ct., Place 4	56.6%	66.0%
2020	U.S. President	55.6%	64.6%
2020	U.S. Senator	57.8%	66.2%
2022	Attorney General*	49.7%	61.1%
2022	Governor*	48.1%	60.2%
2022	Sec. of State*	50.3%	61.6%
2022	Supreme Ct., Place 5*	50.5%	61.5%
2022	U.S. Senator*	49.2%	61.0%

* indicates that the Black candidate of choice was Black

I reserve the right to continue to supplement my reports in light of additional facts, testimony and/or materials that may come to light.

I declare under penalty of perjury that the foregoing is true and correct.

A handwritten signature in blue ink, appearing to read "Maxwell Pal", followed by a horizontal line.

Executed on: September 13, 2023